

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

SOUTH CAROLINA STATE CONFERENCE OF
THE NAACP;

Plaintiff,

v.

TONNYA K. KOHN, in her official capacity
as South Carolina State Court
Administrator;

DONALD W. BEATTY, in his official capacity
as Chief Justice of the South Carolina
Supreme Court;

Defendants.

Case No.: 3:22-cv-01007-MGL

**Plaintiff's Local Rule 26.01
Interrogatory Responses**

Plaintiff South Carolina NAACP hereby responds to Local Rule 26.01 Interrogatories as follows:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

RESPONSE: None.

B. As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiffs seek equitable relief, which should be tried to the Court.

C. State whether the party submitting these responses is a publicly-owned company and separately identify, (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a

parent and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: No plaintiff is a publicly-owned company. Additionally, no plaintiff has a parent corporation or any stockholders.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See Local Civil Rule 3.01 (D.S.C.).*

RESPONSE: Plaintiffs filed this case in the Columbia Division because the defendants engage in their official responsibilities in the Columbia division and a substantial part of the events or omissions giving rise to the claims occurred in the Columbia division.

E. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide, (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: No.

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: N/A

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE: N/A

Dated: March 30, 2022

Respectfully Submitted,

D. Allen Chaney Jr.

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* *pro hac vice motion forthcoming*

Counsel for Plaintiff